

Richard B. Fox, J.D., M.D.
State Bar Number 283447
1875 S. Bascom Avenue, Ste. 2400
Campbell, CA 95008
Tel: 408-402-2452
Fax: 669-221-6281
drfox@drfoxlawoffice.com
Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Free Now Foundation, and Brave And Free
Santa Cruz, Minor Child #1, Mary Barnes,
Mother of Minor Child #1; Minor Child
#2, Colette Brown, Mother of Minor Child
#2, Minor Child #3, Mother, Father, and
Adult Brother of Minor Child #3, Minor
Child #4, Mother and Father of Minor
Child #4;

Plaintiffs

vs.

Erica Pan In Her Official Capacity As
Director Of The California Department Of
Public Health, and Courtney Johnson, In
Her Official Capacity As Principal,
Foothill Technology High School, Ventura
Unified School District; Monica Morales,
Director, Santa Cruz County Health
Services Agency,

Defendants

CASE NO. 2:24-cv-03523-DJC-SCR

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO FILE
AMENDED MOTION FOR PRELIMINARY
INJUNCTION**

Current Deadline: April 9, 2025
Stipulated Deadline: April 23, 2025

Date:
Time:
Courtroom: 7
Judge: Hon. Daniel J. Calabretta

1 Plaintiffs and Defendants, by and through their attorneys of record, hereby stipulate to extend
2 the plaintiffs' deadline for filing their Amended Motion For Preliminary Injunction by two weeks,
3 from April 9, 2025, to April 23, 2025.

4 1. Plaintiffs' filing deadline for its Amended Motion For Preliminary Injunction is currently April
5 9, 2025.

6 2. The parties now stipulate to a two week extension of the filing deadline for Plaintiffs'
7 Amended Motion For Preliminary Injunction to April 23, 2025.

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9 IT IS HEREBY STIPULATED.

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11 Dated: April 9, 2025

Respectfully submitted,
LAW OFFICE OF RICHARD B. FOX, J.D., M.D.
/s/ Richard Fox

13 RICHARD B. FOX, J.D., M.D.
14 Attorneys for Plaintiffs

15 Dated: April 9, 2025

Respectfully submitted,
16 ROB BONTA
Attorney General of California
17 JENNIFER PERKELL
Supervising Deputy Attorney General

19 /s/ Jacquelyn Young
20 JACQUELYN YOUNG
KATHERINE GRAINGER
21 Deputy Attorneys General
Attorneys for Defendant Erica Pan, in
22 her official capacity as the Director of the
23 California Department of Public Health
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1 Dated: April 9, 2025

2 Respectfully submitted,
Olivarez Madruga Law Organization LLP

3 /s/ David Adida
4 Olivarez Madruga Law Organization LLP
Attorneys for Defendant Ventura Unified School District

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7 Dated: April 9, 2025

8 Respectfully submitted,
Office of the Santa Cruz County Counsel

9 /s/ Negine Mansour Sewitsky
10 Office of the Santa Cruz County Counsel
Attorneys for Defendant Monica Morales

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ORDER

The Court, having read and considered the stipulation filed on behalf of Plaintiffs and Defendant Erica Pan, in her official capacity as the Director of the California Department of Public Health (CDPH Director), and finding GOOD CAUSE thereon, hereby grants the stipulated extension of time for Plaintiffs to file their Amended Motion For Preliminary Injunction, IT IS SO ORDERED that Plaintiffs shall file their Amended Motion For Preliminary Injunction on or before April 23, 2025.

Dated: April 9, 2025

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE